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Hearing Date: September 24, 2013
Time: 11:30 am

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

-----X	Chapter 7
In re IMAGE RENT A CAR, INC.,	Case No. 1-11-42390 NHL
Debtor.	Adv. Pro. No. 12-01288 (NHL)
-----X	

GREGORY MESSER, ESQ., as Trustee of the
Estate of Image Rent A Car., Inc.,

-against-

SCHNEIOR ZILBERMAN, ADIR GROUP, INC.
ADIR RENT A CAR, INC., ADIR PLAZA, INCL,
GROUP TRAVEL SOLUTION, INC., AND
GAD SEBAG

**AMENDED NOTICE OF (A) CROSS MOTION OF DIGBY ADLER GROUP, LLC
TO DISMISS THE DEBTOR’S CHAPTER 7 CASE; AND (B) OBJECTION TO THE
TRUSTEE’S PROPOSED SETTLEMENT**

PLEASE TAKE NOTICE that upon the affidavit of Sharky Laguna, CEO of Digby Adler Group LLC d/b/a/ Bandago (“Digby”) and exhibits thereto, Digby hereby files this (a) opposition to the Trustee’s proposed settlement; and (b) motion to dismiss the Debtor’s case for cause, pursuant to 11 U.S.C. § 707 (a) and will proceed before the Honorable Nancy H. Lord, United States Bankruptcy Judge, at the United States Bankruptcy Court, Eastern District of New York, located at 271 Cadman Plaza East, Brooklyn, New York 11201 on September 24, 2013 at 11:30 am or as soon thereafter as counsel may be heard, for the entry of an order (a) denying the

Trustee's proposed settlement agreement and/or (b) granting the dismissal of the Debtor's case for cause and granting such further relief as the Court deems necessary.

PLEASE TAKE FURTHER NOTICE, that responsive papers or objections, if any, to the relief sought in the motion shall be in writing, shall set forth with specificity the grounds therefor, and be filed electronically with the Bankruptcy Court , with a courtesy copy to the Chambers of the Honorable Nancy H. Lord, United States Bankruptcy Judge and served upon so as to be **received** by Lieber & Lieber, LLP, as the attorneys for Digby Adler Group, LLC, Attn: Barbie D. Lieber, and by Chambers **no later than September 17, 2013 at 3:00 p.m.** in accordance with the applicable Bankruptcy and Local Rules. If a party is unable to file electronically with the Bankruptcy, such party shall submit the objection in portable document format (PDF) on a diskette in an envelope with the case name, case number, type and title of the document, document number to which the objection refers and the file name on the outside of the envelope .

PLEASE TAKE FURTHER NOTICE, that the Hearing may be adjourned from time to time without further notice other than the announcement of such an adjournment in open Court or by such other means satisfactory to the Court.

Dated: New York, New York
August 5, 2013

By: /s/ Barbie D. Lieber
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